

EXHIBIT 1

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Jacqueline Scott Corley, Judge

WAYMO, LLC,)	
)	
Plaintiff,)	
)	
VS.)	NO. CV 17-00939-WHA
)	
UBER TECHNOLOGIES, INC., ET AL.,)	
)	
Defendants.)	
)	

San Francisco, California
Monday, August 28, 2017

TRANSCRIPT OF PROCEEDINGS

APPEARANCES:

For Plaintiff:

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(Appearances continued on the next page)

Reported By: Pamela A. Batalo, CSR No. 3593, RMR, FCRR
Official Reporter

1 to an investigation. You've done that. It's actually the
2 centerpiece of your case.

3 So that waiver needs to encompass all the communications
4 to Mr. Brown. That's out. That's out. Or Ms. Johnson or
5 whoever it is as well.

6 And if there are other things in there, well, if you're
7 going -- I think you should meet and confer. I think you
8 should err on the side of disclosure. It doesn't mean it's
9 relevant. It doesn't mean whatever.

10 And then if you have to bring it to me, I will review them
11 in camera, and I will do it quickly. But some things just
12 can't be sliced out. And if it was there -- especially, I
13 think -- and I understand what their argument is. If it's the
14 same thing -- if it's something different that's being
15 communicated about the -- actually, if it's something different
16 that's being communicated about the forensic investigation of
17 these other employees, I think they're entitled to know that
18 because that goes to the investigation that was done of
19 Mr. Levandowski and the other two.

20 So I guess what I'm saying is I haven't seen and I don't
21 know. I really think probably you should be disclosing, to the
22 extent it's in the same communication, rather than redacting.

23 **MR. BAKER:** Understood, Your Honor. We will attempt
24 to work it out with Mr. Chatterjee and bring any outstanding
25 issues to Your Honor or the Special Master.

1 **THE COURT:** And what we could do, because I know we're
2 on a tight timeline here, is rather than briefing, we could
3 just set a hearing and you can bring the documents here and we
4 can sit here and talk about them and do it in realtime that
5 way.

6 **MR. CHATTERJEE:** That's fine with me, Your Honor.

7 **THE COURT:** Okay. So I'll quash the Keker subpoena
8 for now. I understand what you may see. Something may come
9 up. But for now -- well, it's quashed --

10 **MR. CHATTERJEE:** We would like to have a 30(b)(6) of
11 Mr. Gorman testifying about his conversations because he was
12 talking to numerous different people involved with this
13 investigation.

14 **THE COURT:** At Waymo?

15 **MR. CHATTERJEE:** At Waymo.

16 **THE COURT:** Yeah. So talk to the people at Waymo.

17 I anticipated with my order that Mr. Brown would be
18 redeposed because they -- Waymo instructed him not to answer.

19 **MR. CHATTERJEE:** And, Your Honor, if you -- in the
20 investigation of the documents that have been produced, it's
21 not just Mr. Brown; it's numerous people that Mr. Gorman was
22 regularly interacting with, some of which is completely
23 exonerated in this entire 14,000 file issue they have been
24 pounding so hard on.

25 **THE COURT:** Where is that, because I don't see that in

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3 CERTIFICATE OF REPORTER

4 I certify that the foregoing is a correct transcript
5 from the record of proceedings in the above-entitled matter.

6
7 DATE: Tuesday, August 29, 2017

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9 *Pamela A. Batalo*

10 Pamela A. Batalo, CSR No. 3593, RMR, FCRR
11 U.S. Court Reporter

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